

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In Re: Methyl Tertiary Butyl Ether ("MTBE")  
Products Liability Litigation

Master File No. 1:00-1898  
MDL 1358 (SAS)  
M21-88  
ECF Case

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**This document relates to the following case:**

*City of New York v. Amerada Hess Corp., et al.*  
Case No. 04 Civ. 3417

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**DECLARATION OF LESLEY E. WILLIAMS IN SUPPORT OF PLAINTIFF  
CITY OF NEW YORK'S OPPOSITION TO DEFENDANTS' JOINT MOTION *IN*  
*LIMINE* TO EXCLUDE EVIDENCE AND ARGUMENT REGARDING OTHER  
MTBE LITIGATION**

Lesley E. Williams, an attorney licensed to practice in the State of New York and in the United States District Court for the Southern District of New York, hereby declares under penalty of perjury:

1. I am an attorney with the law firm of Sher Leff LLP, counsel for Plaintiff the City of New York ("the City") in the above-captioned matter. I submit this Declaration in support of Plaintiff City of New York's Opposition to Defendants' Joint Motion *in Limine* to Exclude Evidence and Argument Regarding Other MTBE Litigation (the "Opposition"). This declaration authenticates the exhibits attached hereto and relied on in the City's Opposition. In accordance with the Court's Individual Rules and Procedures, the exhibits have been excerpted to include only the relevant material. Copies of each of the exhibits appended hereto were made at my direction on or around May 26, 2009.

2. Attached as Exhibit 1 is a true and correct copy of excerpts of the Deposition of Andrew Madden taken in this case, dated August 22, 2007, 170:14-174:20.

On this 26th day of May 2009, I hereby declare under penalty of perjury under the laws of the United States that the foregoing statements are true and correct.

Dated: San Francisco, California  
May 26, 2009

/s/ LESLEY E. WILLIAMS

LESLEY E. WILLIAMS (LW8392)

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